

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

June 16, 2020

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs") write, with the consent of the Department of Justice ("DOJ") and Federal Bureau of Investigation ("FBI"), to request a brief two-week further extension of the deadline for Plaintiffs' Reply in Support of their Second Motion to Compel Directed to the FBI and Opposition to the FBI's Cross-Motion for a Protective Order.

The brief further extension is needed to allow time for ongoing coordination activities among the PECs, and because the FBI served a supplemental production of documents on June 11, 2020 (the Eleventh Tranche). The PECs and their consultants are reviewing the Eleventh Tranche presently, and believe the content and timing of that production may be relevant to arguments Plaintiffs will be advancing in their brief.

For the foregoing reasons, the PECs respectfully request that the deadline for their reply and opposition brief be extended to July 2, 2020. Given vacation schedules, the DOJ and FBI have proposed that the parties meet and confer within one week after submission of Plaintiffs' brief, to discuss an appropriate deadline for the FBI's reply. Plaintiffs consent to that proposal.

Honorable Sarah Netburn  
June 16, 2020

We thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,

KREINDLER & KREINDLER LLP

MOTLEY RICE LLC

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*On behalf of the MDL 1570 Plaintiffs' Exec.  
Committees*

*On behalf of the MDL 1570 Plaintiffs' Exec.  
Committees*

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*On behalf of the MDL 1570 Plaintiffs' Exec.  
Committees*